

**REMARKS**

At the time of the Office Action of April 2, 2007, claims 1-20 are pending in this application. The indication of allowable subject matter in claims 3-8 and 11-17 is acknowledged and appreciated.

In this Amendment, claims 3, 8, and 11 have been amended to be independent form, and claims 1, 2, 9, 10, and 18 have been canceled. Care has been exercised to avoid the introduction of new matter. Claims 3-8, 11-17, 19, and 20 are now active in this application, of which claims 3, 8, 11, and 19 are independent.

In view of the following remarks, it is respectfully submitted that all claims are in condition for allowance.

**The Rejection of Claims 1, 2, 9, 10, and 10**

Claims 1, 2, 9, 10, and 18 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Nagamasa et al. and as being anticipated by Fujioka. These rejections of claims 1, 2, 9, 10, and 18 have been rendered moot by the cancellation of those claims. Withdrawal of the rejection of the claims is, therefore, respectfully solicited.

**The Rejection of Claims 19 and 20**

Claims 19 and 20 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Fujioka. The Examiner asserted that Fujioka discloses an information processing device identically corresponding to what is claimed. This rejection is respectfully traversed.

Applicants submit that Fujioka does not identically disclose a content reproduction method including all the limitations recited in independent claim 19. Specifically, Fujioka does not disclose, among other things, the following limitations:

- reading an original content stored in an irreproducible area of an external memory into an LSI device;

- generating a data inherent key in the LSI device using an inherent ID stored in an internal memory;

- encrypting the original content in the LSI device using the data inherent key;

- storing the encrypted content in a reproducible area of the external memory; ...

- decrypting the encrypted content in the LSI device using the data inherent key; and ....

Fujioka discloses transmitting data encrypted by using key data and decrypting received data by using the key data. In the statement of the rejection, the Examiner simply reproduced claim 19 and mentioned, “see paragraphs [0080];[0085]-[0098] and Figures 5, 6 and 7” (see page 5 of the Office Action). However, these paragraphs and figures do not teach the claimed subject matter for the reasons set forth below.

Figures 5 and 6 show the method of changing the order in which the arithmetic computation programs are executed in encryption program according to the random number. Figure 7 shows the method of selecting dummy key data according to the random number.

Paragraph [0080] discloses that in order to make power analysis difficult, the operation frequency of the clock is made to change while the encryption circuit performs arithmetic computations. Paragraphs [0085] – [0098] disclose that in order to make power analysis difficult, a random noise is generated in the Vcc line by using the random number, and in order that the power consumption may not change due to data transfer, data and corresponding inverted data are transmitted together.

Based on the above, it is apparent that Fujioka does not disclose reproducing content in the LSI device, as claimed. In addition, Fujioka fails to disclose or suggest, among other things, encrypting an original content stored in an irreproducible area of an external memory and storing the encrypted content in the reproducible area of the external memory, as recited in claim 19. Furthermore, Fujioka does not disclose generating a data inherent key in the LSI device using an inherent ID stored in an internal memory and using the generated data inherent key for encryption and decryption.

In contrast, claim 19 recites reading an original content stored in an irreproducible area of an external memory into an LSI device. A data inherent key in the LSI device is generated using an inherent ID stored in an internal memory. The original content in the LSI device is encrypted using the data inherent key, and the encrypted content is stored in a reproducible area of the external memory. The encrypted content in the LSI device is decrypted using the data inherent key.

As anticipation under 35 U.S.C. § 102 requires that each and every element of the claim be disclosed, either expressly or inherently (noting that "inherency may not be established by probabilities or possibilities", *Scaltech Inc. v. Retec/Tetra*, 178 F.3d 1378 (Fed. Cir. 1999)), in a single prior art reference, *Akzo N.V. v. U.S. Int'l Trade Commission*, 808 F.2d 1471 (Fed. Cir. 1986), based on the forgoing, it is submitted that Fujioka does not anticipate claim 19, nor claim 20 dependent thereon.

Based on the foregoing, it is respectfully submitted that all pending claims are patentable over the cited prior art. Accordingly, it is respectfully requested that the rejection under 35 U.S.C. §102 be withdrawn.

**CONCLUSION**

Having fully and completely responded to the Office Action, Applicants submit that all of the claims are now in condition for allowance, an indication of which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP



Ramyar M. Farid  
Registration No. 46,692

600 13<sup>th</sup> Street, N.W.  
Washington, DC 20005-3096  
Phone: 202.756.8000 RMF:MaM  
Facsimile: 202.756.8087  
**Date: August 2, 2007**

**Please recognize our Customer No. 53080  
as our correspondence address.**